

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TIARE TECHNOLOGY, INC.,

Plaintiff,

v.

CHICK-FIL-A, INC.,

Defendants.

No. 2:21-cv-00149-JRG-RSP

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
MOVE, ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Chick-fil-A, Inc. (“Defendant” or “Chick-fil-A”), without waiving any defenses, respectfully moves the Court to extend the time within which Defendant is required to move, answer, or otherwise respond to Plaintiff’s Complaint by fifteen (15) days from July 29, 2021 to August 13, 2021. This motion is unopposed by Plaintiff Tiare Technology, Inc. (“Plaintiff” or “Tiare”). In support of their Motion, Defendant states as follows:

1. On April 29, 2021, Plaintiff filed its Complaint alleging patent infringement against Defendant.
2. Defendant previously requested and was granted a total of forty-five (45) days extension to respond to the original Complaint, pursuant to Local Rule CV-12. (Dkt. Nos. 7, 8).
3. Plaintiff has consented to this motion request for an additional fifteen (15) days to respond to the Complaint.
4. Defendant requests this additional extension of time in good faith, in light of the upcoming deadline to respond to the Complaint, and not for purposes of delay.

5. Defendant's agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including for example, Defendant's right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the patents.

WHEREFORE, Defendant Chick-fil-A, Inc. respectfully request that the time in which it is required to move, answer, or otherwise respond to Plaintiff's Complaint for patent infringement be extended up to and including August 13, 2021.

Dated: July 27, 2021

/s/ Robert L. Lee

Robert L. Lee

(Georgia Bar No. 443,978)

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*Attorneys for Defendant
Chick-fil-A, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on July 27, 2021.

/s/ Robert L. Lee
Robert L. Lee (Georgia Bar No. 443,978)

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that pursuant to Local Rules CV-7(h) and (i), counsel for Defendant Chick-fil-A, Inc. conferred with counsel for Plaintiff Tiare Technology, Inc. regarding the foregoing motion and counsel indicated that they agree to the relief sought herein.

/s/ Robert L. Lee
Robert L. Lee (Georgia Bar No. 443,978)